1 The Honorable Robert S. Lasnik 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 Case No. 2:10-CV-01264-RSL Y-TEX CORPORATION, 10 STIPULATION AND [PROPOSED] Plaintiff, ORDER TO EXTEND DEADLINES 11 TO AMEND PLEADINGS AND FOR vs. EXPERT DISCLOSURES 12 SCHENKER, INC., 13 **Note for Motion Calendar:** Defendant. 14 Wednesday, June 8, 2011 15 SCHENKER, INC., 16 Third-Party Plaintiff, 17 vs. 18 M/V WESTFALIA EXPRESS, her 19 engines, tackle, boilers, etc., HAPAG-LLOYD (AMERICA) INC., and HAPAG-20 LLOYD AKTIENGESELLSCHAFT. 21 Third-Party Defendants. 22 23 The parties respectfully request that the June 8, 2011, deadlines to amend 24 pleadings and to exchange expert witness reports be extended to September 8, 2011, 25 to allow the parties sufficient time to prepare once the Court has issued its rulings 26 on Third Party Defendant Hapag-Lloyd's Motion to Dismiss (Dkt. No. 29) and 27 Defendant Schenker's Motion for Partial Summary Judgment (Dkt. No. 48). The 28 Case No.: 2:10-CV-01264-RSL KEESAL, YOUNG & LOGAN STIPULATION AND (PROPOSED) ORDER TO 1301 FIFTH AVENUE, SUITE 1515 EXTEND DEADLINES TO AMEND PLEADINGS SEATTLE, WASHINGTON 98101

(206) 622-3790

AND FOR EXPERT DISCLOSURES - 1

1	parties also request that the August 7, 2011 deadline to complete discovery be	
2	extended to November 7, 2011, to accommodate the requested expert disclosure	
3	deadline. The requested extensions are not intended to affect any other case	
4	deadlines, including the trial date.	
5	Respectfully Submitted:	
6		
7	KEESAL YOUNG & LOGAN	NICOLL BLACK & FEIG, PLLC
8		
9	/s/ Molly J. Henry Philip R. Lempriere, WSBA No. 20304	/s/ Christopher W. Nicoll (by agreement) Christopher W. Nicoll, Esq.
10	Molly J. Henry, WSBA No. 40818 Keesal, Young & Logan	Puget Sound Plaza
11	1301 Fifth Ave., Suite 1515 Seattle, WA 98101	1325 Fourth Avenue, Suite 1650 Seattle, WA 98101
12	Tel: (206) 622-3790 Fax: (206) 343-9529	Tel: (206) 838-7555 Attorneys for Plaintiff
13	Attorneys for Defendant Hapag-Lloyd Inc.	
14	FOSTER PEPPER PLLC	
15		
16	/s/ Steven W. Block (by agreement)	
17	Steven W. Block, WSBA No. 24299 Foster Pepper PLLC	
18	1111 Third Avenue, Suite 3400	
19	Seattle, WA 98101-3299 Phone: 206-447-7273	
	E-mail: <u>sblock@foster.com</u>	
20	Attorneys for Defendant Schenker Inc.	
21	It is so ORDERED.	
22 23	Done in open court this 9 <sup>th</sup> day of June, 2011.	
24	MNS Casnik	
25	Robert S. Lasnik	
26	United States District Judge	
27		
28	Case No.: 2:10-CV-01264-RSL STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES TO AMEND PLEADINGS AND FOR EXPERT DISCLOSURES - 2  KEESAL, YOUNG & LOGAN 1301 FIFTH AVENUE, SUITE 1515 SEATTLE, WASHINGTON 98101 (206) 622-3790	